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California Energy Commission

DOCKETED

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California Energy Commission
Attn: Docket 15-BSTD-01
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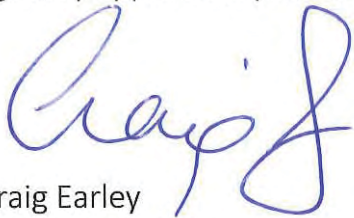
Re: Docket No. 15-BSTD-01; Proposed Amendments of Section 141.0(b)(2) and Table 141.0-E

I am writing in opposition to the proposed rollback of lighting control and acceptance test requirements for alterations and modifications of both indoor and outdoor luminaires of existing buildings. I understand that the commission is considering a number of proposals that would weaken current lighting control requirements, including: (1) increasing the percent of luminaire replacements that would trigger Section 130.1 (a), (b), (c) and (d) control requirements from 10% of existing luminaires to 20% of existing luminaires; (2) exempting alterations from acceptance test requirements when 20 or fewer controls are added; (3) exempting luminaire modifications from any multi-level, shut-off or daylighting control requirements; and (4) exempting luminaire alterations or modifications from existing lighting control or lighting power allowance requirements where the modified luminaires have at least 20 percent lower power consumption compared to the original luminaires. I oppose all of these proposals and any other proposals that the Commission may be considering that would weaken lighting control or acceptance test requirements for alterations and modifications of indoor or outdoor luminaires. I also oppose any changes to the wiring alteration requirements that would reduce current control requirements.

Lighting is the biggest opportunity to save energy - roughly twice that of air conditioning - on an annual basis. While LEDs can save 20% or more of lighting energy, controls essentially DOUBLE the savings. The 2013 code requirements for vacancy controls, daylighting and other controls must continue and expand for 2016. Going backwards is not an option.

Claiming that lighting controls are too expensive as a reason for gutting the code is wrong for many reasons. One example: The broad code requirement for lighting controls is actually reducing costs by creating demand that drives economies of scale. Whether we look at big screen TVs, laptop computers, hybrid cars, or memory chips, increased volume drives costs down. If the CEC reduces requirements for lighting controls it will stall cost reduction! Already, the demand created by 2013 code requirements has resulted in better devices at more reasonable prices. If the CEC backs away from controls it would send mixed signals to manufacturers and would stunt technological progress and price reductions.

I greatly appreciate your willingness to let the industry provide their input.



Craig Earley
Vice President / General Manager

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